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April 4, 2022

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Klimovitsky v. JG Innovative Industries, Inc., et al.
Case No. 21-CV-755 (MKB)(RER)

Dear Judge Reyes:

This firm represents the defendants in the above-referenced action. I write jointly with counsel for the plaintiff to provide the Court with this requested status report regarding this case.

Following the successful mediation session which the parties attended before EDNY mediator Barry J. Peek, Esq. on March 15, 2022, the parties are in the process of drafting and executing documents embodying a global resolution of all of the plaintiff's claims in this action. As part of such resolution, the parties shall be submitting a settlement agreement covering plaintiff's wage and hour claims asserted pursuant to the Fair Labor Standards Act and New York Labor Law to the Court for approval pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015). The parties respectfully propose that they be given until May 5, 2022 to submit such settlement agreement for Cheeks review.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Jonathan Shalom, Esq.
Counsel for Plaintiff
(via ecf)